

## UNITED STATES DISTRICT COURT

Southern

District of

Florida

UNITED STATES OF AMERICA  
V.  
MUSTAPHA RAJI

**COMMITMENT TO ANOTHER  
DISTRICT**

## DOCKET NUMBER

## MAGISTRATE JUDGE CASE NUMBER

District of Arrest

District of Offense

District of Arrest

District of Offense

SD/NY

19 CRIM 870

Southern District of Florida

19-620-VALLE

## CHARGES AGAINST THE DEFENDANT ARE BASED UPON AN

☒ Indictment. ☐ Information ☐ Complaint ☐ Other (specify)

charging a violation of 18 U.S.C. § 1343, 2315, 1956

## DISTRICT OF OFFENSE

Southern District of New York

## DESCRIPTION OF CHARGES:

Conspiracy to commit fraud, wire fraud, receipt of stolen funds and conspiracy to commit money laundering.

## CURRENT BOND STATUS:

- ☐ Bail fixed at \_\_\_\_\_ and conditions were not met  
☒ Government moved for detention and defendant detained after hearing in District of Arrest  
☐ Government moved for detention and defendant detained pending detention hearing in District of Offense  
☐ Other (specify) \_\_\_\_\_

Representation: ☐ Retained Own Counsel ☐ Federal Defender Organization ☒ CJA Attorney <sup>JDAQUIN MENDEZ</sup> ☐ None

Interpreter Required? No Yes Language \_\_\_\_\_

DISTRICT FL/Southern

TO: THE UNITED STATES MARSHAL

You are hereby commanded to take custody of the above named defendant and to transport that defendant with a certified copy of this commitment forthwith to the district of offense as specified above and there deliver the defendant to the United States Marshal for that District or to some other officer authorized to receive the defendant.

1/7/20  
Date

*Lurana S. Snow*  
United States Judge or Magistrate Judge  
LURANA S. SNOW

## RETURN

This commitment was received and executed as follows:

DATE COMMITMENT ORDER RECEIVED

PLACE OF COMMITMENT

DATE DEFENDANT COMMITTED

DATE

UNITED STATES MARSHAL

(BY) DEPUTY MARSHAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 19-6620-VALLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MUSTAPHA RAJI,

Defendant.

---

**DETENTION ORDER**

Pursuant to 18 U.S.C. § 3142(f), on January 7, 2020, a hearing was held to determine whether Defendant, Mustapha Raji should be detained prior to trial. Having considered the factors enumerated in 18 U.S.C. § 3142(g), this Court finds that no condition or combination of conditions will reasonably assure the appearance of this Defendant as required and/or the safety of any other person and the community. Therefore, it is hereby ordered that Defendant, Mustapha Raji be detained prior to trial and until the conclusion thereof.

In accordance with the provisions of 18 U.S.C. § 3142(i), the Court hereby makes the following findings of fact and statement of reasons for the detention:

1. The Defendant is charged with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 71; wire fraud, in violation of 18 U.S.C. § 343; receipt of stolen funds, in violation of 18 U.S.C. § 2315, and conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(a)(1)(B)(I). 18 U.S.C. § 3142(g)(1).

2. The weight of the evidence against the Defendant is substantial. Government witnesses will testify that in July 2018, the e-mail system of a Manhattan, New York hedge fund was compromised, resulting in a fraudulent wire transfer of \$1.7 million from the hedge fund to Unique Bamboo Investments, a Florida corporation of which the Defendant was vice president. The Defendant received at least \$50,000 of the funds fraudulently transferred, and later accessed websites

which provided instructions on how to wipe a computer hard drive. In connection with this scheme, fraudulent documents were forwarded which purported to reflect a loan from the victim hedge fund to Unique Bamboo Investments. The Government has recovered approximately \$1 million of the fraudulently transferred funds, while approximately \$700,000 of those funds remain missing. 18 U.S.C. § 3142(g)(2).

3. The pertinent history and characteristics of the Defendant are that he is a national of Ghana, but states that he does not have a passport from that country. The Defendant does possess a Canadian passport, which was seized by the arresting officers. He entered the United States on a tourist visa which since has expired, and therefore is unlawfully present in the United States. The Defendant claims self-employment at a company called Emergent Development Corporation, earning approximately \$80,000 per year, but he has no assets or liabilities. He suffers from hypertension and a heart condition, for which he takes medication.

The Defendant has no criminal record, but has minimal ties to this community and strong ties to Ghana and Canada. He has no incentive to appear for trial and must be deemed a risk of flight. 18 U.S.C. § 3142(g)(3)(A) and (B).

4. The Court specifically finds that there are no conditions or combination of conditions which reasonably will assure the Defendant's appearance as required and/or the safety of any other person and the community. 18 U.S.C. § 3142(e).

Based upon the above findings of fact, which were supported by clear and convincing evidence, the Court has concluded that this Defendant presents a serious risk of flight if released prior to trial. The Court hereby directs:

(a) That the Defendant be committed to the custody of the Attorney General for confinement in a corrections facility separate, to the extent practical, from persons awaiting or serving sentences or being held in custody pending appeal;

(b) That the Defendant be afforded reasonable opportunity for private consultation with counsel; and

(c) That, on order of a court of the United States or on request of an attorney for the Government, the person in charge of the corrections facility in which the Defendant is confined deliver the Defendant to a United States Marshal for the purpose of an appearance in connection with a court proceeding.

DONE AND ORDERED at Fort Lauderdale, Florida, this 10th day of January, 2020.

  
LURANA S. SNOW  
UNITED STATES MAGISTRATE JUDGE

Copies to:

AUSA William Shockley (FTL)  
Joaquin Mendez, Jr., Esq. (CJA)

U.S. Probation Office (FTL)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 19-mj-6620-VALLE

UNITED STATES OF AMERICA,

v.

MUSTAPHA RAJI,

Defendant.

CERTIFICATE OF COMPLIANCE RE ADMITTED EVIDENCE

I, William T. Shockley, as counsel for the United States of America, hereby certify as follows:

Check the applicable sections:

☒ ALL EXHIBITS E-FILED: All documentary exhibits and photographs of non-documentary physical exhibits admitted into evidence have been electronically filed in CM/ECF.

☐ EXHIBITS NOT E-FILED: Some documentary exhibits and/or other physical exhibits admitted into evidence cannot be electronically filed in CM/ECF. This includes sealed criminal exhibits and contraband. The following identifies those exhibit numbers that have been retained by the Clerk, and separately identifies those exhibit numbers retained by this filing party. (Itemize or attach a list).

Retained by the Clerk: \_\_\_\_\_

Retained by filing party: \_\_\_\_\_

☐ AUDIO/VIDEO EXHIBITS: The following audio and/or video exhibits were entered into evidence during these proceedings. The filing party has conventionally filed with the Clerk of Court a CD or DVD containing the audio or video recording. **Counsel filing audio and/or video exhibits understands that all conventionally filed exhibits are available for public viewing unless filed under seal.**

(Itemize or attach a list.) \_\_\_\_\_

Any original exhibits that have been returned to or retained by the filing party after electronic filing shall be kept for safe keeping until the conclusion of any appeals. Upon order of court, the filing party agrees to return the original exhibits to the Clerk of Court.

This Certificate shall be filed within three (3) days of the conclusion of trial or relevant proceedings. Failure to timely comply with the requirements of Administrative Order 2016-70 governing the Electronic Filing of Exhibits may result in the imposition of sanctions.

Respectfully Submitted,

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

By: s/William T. Shockley  
ASSISTANT UNITED STATES ATTORNEY  
500 East Broward Boulevard, Suite 700  
Fort Lauderdale, Florida 33394  
Court No. A5500088  
Telephone No. (954) 660-5787  
Telefax No. (954) 356-7230  
E-Mail: William.T.Shockley@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2020, I electronically filed this document with the Clerk of the Court using CM/ECF.

s/William T. Shockley  
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MUSTAPHA RAJI,

Defendant.

SDNY  
INDICTMENT

19 Cr. \_\_\_\_\_

19 CRIM 870

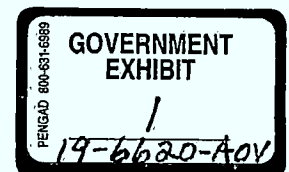
COUNT ONE

(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

1. From at least in or about July 2018 up to and including at least in or about September 2018, in the Southern District of New York and elsewhere, MUSTAPHA RAJI, the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that MUSTAPHA RAJI, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television



communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, RAJI participated in a scheme to fraudulently induce a corporate victim to conduct an interstate wire transfer in the amount of approximately \$1.7 million, to a bank account controlled by a co-conspirator.

(Title 18, United States Code, Section 1349.)

COUNT TWO  
(Wire Fraud)

The Grand Jury further charges:

3. From at least in or about July 2018 up to and including at least in or about September 2018, in the Southern District of New York and elsewhere, MUSTAPHA RAJI, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, RAJI participated in a scheme to fraudulently induce a corporate victim to conduct an



interstate wire transfer in the amount of approximately \$1.7 million, to a bank account controlled by a co-conspirator.

(Title 18, United States Code, Sections 1343 and 2.)

**COUNT THREE**  
**(Receipt of Stolen Funds)**

The Grand Jury further charges:

4. From at least in or about July 2018 up to and including at least in or about September 2018, in the Southern District of New York and elsewhere, MUSTAPHA RAJI, the defendant, received, possessed, concealed, stored, bartered, sold, and disposed of goods, wares, merchandise, securities, and money, of the value of \$5,000 and more, which had crossed a state boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, to wit, MUSTAPHA RAJI received, and aided and abetted the receipt of, approximately \$1.7 million in proceeds of a fraud scheme via a wire transfer from a bank in New York to a bank account in Florida controlled by a co-conspirator.

(Title 18, United States Code, Sections 2315 and 2.)

COUNT FOUR  
(Money Laundering Conspiracy)

The Grand Jury further charges:

5. From at least in or about July 2018 up to and including at least in or about September 2018, in the Southern District of New York and elsewhere, MUSTAPHA RAJI, the defendant, and others known and unknown, knowingly did combine, conspire, confederate and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957(a).

6. It was a part and an object of the conspiracy that MUSTAPHA RAJI, the defendant, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction which in fact involved the proceeds of specified unlawful activity, to wit, the wire fraud offenses charged in Counts One and Two of this Indictment, in violation of 18 U.S.C. §§ 1343 and 1349, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

7. It was further a part and an object of the conspiracy that MUSTAPHA RAJI, the defendant, and others known and unknown, knowingly would and did engage and attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, the proceeds of the wire fraud offenses charged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Section 1957(a).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATION

8. As a result of committing the offenses alleged in Counts One through Three of this Indictment, MUSTAPHA RAJI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

9. As a result of committing the offense alleged in Count Four of this Indictment, MUSTAPHA RAJI, the defendant, shall forfeit to the United States, pursuant to Title 18, United

States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

SUBSTITUTE ASSET PROVISION

10. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value;

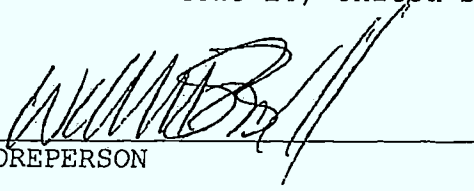
or

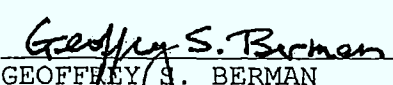
(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
GEOFFREY S. BERMAN  
United States Attorney

12/11/19  
Pls Submit w/ the above  
my life man  
for man  
GEOFFREY S BERMAN  
United States Attorney

(18 U.S.C. §§ 1343, 1349, 1956(h), 2315,  
and 2.)

19 Cr. \_\_\_\_\_

INDICTMENT

MUSTAPHA RAJI.

- v. -

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Form No. USA-33s-274 (Ed. 9-25-58)

Mod AO 442 (09/13) Arrest Warrant AUSA Name & Telno: Dina McLeod, 212-637-1040

# UNITED STATES DISTRICT COURT

for the

Southern District of New York

United States of America

v.

MUSTAPHA RAJI

Case No.

19 CRIM 870

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) MUSTAPHA RAJI

who is accused of an offense or violation based on the following document filed with the court:


- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint  
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

- 18 USC 1349 - Conspiracy to Commit Wire Fraud
- 18 USC 1343 - Wire Fraud
- 18 USC 2315 - Receipt of Stolen Funds
- 18 USC 1956(h) - Money Laundering Conspiracy

Date: 12/04/2019

City and state: New York, New York

  
 Issuing officer's signature  
 US Magistrate Judge Barbara C. Moses  
 Printed name and title

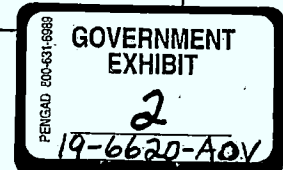
### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title







## COURT MINUTES

## U.S. MAGISTRATE JUDGE LURANA S.SNOW - FORT LAUDERDALE, FLORIDA

DEFT: MUSTAFA RAJI (J)# CASE NO: 19-6620-VALLE

AUSA: William Shockley *present* ATTY: JOAQUIN MENDEZ (CSA) *present*  
(If applicable-appeals colloquy)

AGENT: \_\_\_\_\_ VIOL: \_\_\_\_\_

PROCEEDING: PTD/ REMOVAL HEARING RECOMMENDED BOND: \_\_\_\_\_

BOND HEARING HELD: Yes / no COUNSEL APPOINTED: \_\_\_\_\_

BOND SET @: \_\_\_\_\_ To be cosigned by: \_\_\_\_\_

- ☐ Do not violate any law.
- ☐ Appear in court as directed.
- ☐ Surrender and / or do not obtain passports / travel documents.
- ☐ Rpt to PTS as directed / or \_\_\_\_\_ x's a week/month by phone; \_\_\_\_\_ x's a week/month in person.
- ☐ Random urine testing by Pretrial Services. \_\_\_\_\_ Treatment as deemed necessary.
- ☐ Maintain or seek full - time employment.
- ☐ No contact with victims / witnesses.
- ☐ No firearms.
- ☐ Curfew: \_\_\_\_\_
- ☐ Travel extended to: \_\_\_\_\_
- ☐ Halfway House \_\_\_\_\_

*Gone proceeds by proper*

*G. Exhibits # 1 copy of indict. - rec'd*

*# 2 copy of arrest warrant - rec'd*

*# 3 photo - rec'd*

*Agent sworn - John Nigel Dugue*

*ID proven. INS detainee expected.*

*A - concerned about health issues.*

*Court finds:*

*A - has no status in US.*

*Court finds A a risk of flight*

*PTD ordered.*

*Court asks USM to expedite transport to NY + provide medications.*

NEXT COURT APPEARANCE: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ JUDGE: \_\_\_\_\_ PLACE: \_\_\_\_\_

INQUIRY RE COUNSEL: \_\_\_\_\_

PTD/BOND HEARING: \_\_\_\_\_

PRELIM/ARRAIGN. OR REMOVAL: \_\_\_\_\_

CHECK IF APPLICABLE: \_\_\_\_\_ For the reasons stated by counsel for the Defendant and finding that the ends of justice served by granting the ore tenus motion for continuance to hire counsel outweigh the best interests of the public & the Defendant in a Speedy Trial, the Court finds that the period of time from today, through and including \_\_\_\_\_, shall be deemed excludable in accordance with the provisions of the Speedy Trial Act, 18 USC 3161 et seq..

DATE: 1-7-20 TIME: 11:00am DAR: 11:02:52 PAGE: \_\_\_\_\_

*40 min*

## COURT MINUTES

## U.S. MAGISTRATE JUDGE LURANA S. SNOW - FORT LAUDERDALE, FLORIDA

DEFT: MUSTAPHA RAJI (J)# CASE NO: 19-6620-VALLE

AUSA: William Shockley / Asay Alexander ATTY: ATTY (FPD conflicted)  
(If applicable-appeals colloquy)

AGENT: \_\_\_\_\_ VIOL: \_\_\_\_\_

PROCEEDING: REPORT RE COUNSEL RECOMMENDED BOND: \_\_\_\_\_

BOND HEARING HELD - yes / no COUNSEL APPOINTED: \_\_\_\_\_

BOND SET @: \_\_\_\_\_ To be cosigned by: CJA - Joaquin<sup>2</sup> Mendez<sup>3</sup>

☐ Do not violate any law. Defendant had initial on 12/20 but requested additional time for PTD.

☐ Appear in court as directed. A-has not hired an atty.

☐ Surrender and / or do not obtain passports / travel documents. yet. He is interviewing

☐ Rpt to PTS as directed / or \_\_\_\_\_ x's a week/month by phone; \_\_\_\_\_ x's a week/month in person. Attys.

☐ Random urine testing by Pretrial Services. \_\_\_\_\_ Treatment as deemed necessary. A-now wants to be sworn

☐ Maintain or seek full - time employment. for counsel.

☐ No contact with victims / witnesses. A-found inept

☐ No firearms. CJA to be appointed

☐ Curfew: \_\_\_\_\_ Joaquin Mendez

☐ Travel extended to: \_\_\_\_\_

☐ Halfway House \_\_\_\_\_

| NEXT COURT APPEARANCE: | DATE: | TIME: | JUDGE: | PLACE: |
|------------------------|-------|-------|--------|--------|
|------------------------|-------|-------|--------|--------|

INQUIRY RE COUNSEL: \_\_\_\_\_

PTD HEARING: 1-7-20 11:00am SNOWREMOVAL HEARING: 1-7-20 11:00am SNOW

CHECK IF APPLICABLE \_\_\_\_\_: For the reasons stated by counsel for the Defendant and finding that the ends of justice served by granting the ore tenus motion for continuance to hire counsel outweigh the best interests of the public & the Defendant in a Speedy Trial, the Court finds that the period of time from today, through and including \_\_\_\_\_, shall be deemed excludable in accordance with the provisions of the Speedy Trial Act, 18 USC 3161 et seq..

| DATE: | TIME: | DAR: | PAGE: |
|-------|-------|------|-------|
|-------|-------|------|-------|

1-3-20

1:00 PM

DAR:

13:12:00ish

PAGE:

7mms

SCANNED

UNITED STATES DISTRICT COURT FOR SOUTHERN DISTRICT OF FLORIDA \*\*COURT ORDER/MINUTES\*\*

U.S. MAGISTRATE JUDGE BARRY S. SELTZER - FORT LAUDERDALE, FLORIDA ROOM 110

DEFT: MUSTAPHA RAJI (J)#26004-104 CASE NO: 19-6620-VALLE  
AUSA: W. SHOCKLEY ATTY:  
USPO: VIOL: 18:U.S.C. § 1343

PROCEEDING: REPORT RE COUNSEL RECOMMENDED BOND:

BOND/PTD HEARING HELD - yes / no COUNSEL APPOINTED:

BOND SET @: To be cosigned by:

- ☐ All standard conditions
  - ☐ Do not encumber property.
  - ☐ Surrender and / or do not obtain passports / travel documents.
  - ☐ Rpt to PTS as directed / or x's a week/month by phone; x's a week/month in person.
  - ☐ Random urine testing by Pretrial Services. Treatment as deemed necessary.
  - ☐ Maintain or seek full - time employment.
  - ☐ No contact with victims / witnesses.
  - ☐ No firearms.
  - ☐ Electronic Monitoring:
  - ☐ Travel extended to:
  - ☐ Other:
- DEFENDANT PRESENT WITHOUT COUNSEL  
GOVERNMENT INFORMS THE COURT, GAVE PHONE  
NUMBERS TO DEFENDANT TO CONTACT FAMILY  
TO HIRE AN ATTORNEY ON HIS BEHALF.  
FPD HAS A CONFLICT \*\*\*\*  
COURT RE-SETS REPORT RE COUNSEL FOR  
FRIDAY JANUARY 3 2020 AT 1 PM (DUTY SNOW)

NEXT COURT APPEARANCE: DATE: TIME: JUDGE: PLACE:

REPORT RE COUNSEL: JANUARY 3, 2020 AT 1 PM (DUTY SNOW)

PTD/BOND HEARING: JANUARY 7, 2020 AT 11 AM (DUTY SNOW)

PRELIM/ARRAIGN OR REMOVAL: JANUARY 7, 2020 AT 11 AM (DUTY SNOW)

STATUS RE EXTRADITION/HRG:

TE: 12/30/19 TIME: 11:00 AM FTL/TAPE/# Begin DAR:  
BSS-

[5 MINS]

\*\*\*THE TIME FROM TODAY THROUGH THE RE-SCHEDULED DATE IS EXCLUDED FROM THE DEADLINE FOR TRIAL AS COMPUTED UNDER THE SPEEDY TRIAL ACT \*\*\*\*\* (YES OR NO) DAR:11:05:11-11:07:55

UNITED STATES DISTRICT COURT FOR SOUTHERN DISTRICT OF FLORIDA \*\*COURT ORDER/MINUTES\*\*

U.S. MAGISTRATE JUDGE BARRY S. SELTZER - FORT LAUDERDALE, FLORIDA ROOM 110

DEFT: MUSTAPHA RAJI (J)#26004-104 CASE NO: 19-6620-VALLE  
AUSA: W. SHOCKLEY (R. JUMAN DUTY AUSA) ATTY:  
USPO: VIOL: 18:U.S.C. § 1343

PROCEEDING: REPORT RE COUNSEL RECOMMENDED BOND:

BOND/PTD HEARING HELD - yes / no COUNSEL APPOINTED:

BOND SET @: To be cosigned by:

- |  |  |
|--|--|
| <input type="checkbox"/> All standard conditions   | DEFENDANT PRESENT WITHOUT COUNSEL              |
| <input type="checkbox"/> Do not encumber property.   | INFORMS THE COURT HE HAD BEEN AT THE HOSPITAL  |
| <input type="checkbox"/> Surrender and / or do not obtain passports / travel documents.                        | DUE TO HIS HIGH BLOOD PRESSURE. HAS NOT BEEN   |
| <input type="checkbox"/> Rpt to PTS as directed / or_ x's a week/month by phone; _ x's a week/month in person. | ABLE TO CONTACT FAMILY MEMEMBERS WHO CAN       |
| <input type="checkbox"/> Random urine testing by Pretrial Services. Treatment as deemed necessary.             | HIRE PRIVATE COUNSEL. COURT MADE INQUIRY       |
| <input type="checkbox"/> Maintain or seek full - time employment.  | AS TO RETAINING PRIVATE COUNSEL OR WISHES TO   |
| <input type="checkbox"/> No contact with victims / witnesses.  | HAVE COURT APPOINTMENT COUNSEL. HE JUST WANTS  |
| <input type="checkbox"/> No firearms.  | MORE TIME TO HIRE HIS OWN AND CONTACT FAMILY   |
| <input type="checkbox"/> Electronic Monitoring:  | GOVERNMENT CALLED FBI AGENT TO GET PHONE       |
| <input type="checkbox"/> Travel extended to:   | NUMBERS FOR THE DEFT, NO ANSWER. DEFT REQUEST  |
| <input type="checkbox"/> Other:  | MORE TIME. GRANTED. RRC/REMOVAL/PTD HRGS RESET |

|                        |       |       |        |        |
|------------------------|-------|-------|--------|--------|
| NEXT COURT APPEARANCE: | DATE: | TIME: | JUDGE: | PLACE: |
|------------------------|-------|-------|--------|--------|

REPORT RE COUNSEL: MONDAY JANUARY 30, 2019 AT 11 AM DUTY (BSS)

PTD/BOND HEARING: TUESDAY JANUARY 7, 2020 AT 11 AM DUTY (SNOW)

PRELIM/ARRAIGN OR REMOVAL: TUESDAY JANUARY 7, 2020 AT 11 AM DUTY (SNOW)

STATUS RE EXTRADITION/HRG:

TE: 12/27/19 TIME: 11:00 AM FTL/TAPE/# BSS- Begin DAR:

[20 MINS]

\*\*\*THE TIME FROM TODAY THROUGH THE RE-SCHEDULED DATE IS EXCLUDED FROM THE DEADLINE FOR TRIAL AS COMPUTED UNDER THE SPEEDY TRIAL ACT \*\*\*\*\* (YES OR NO) DAR:10:33:22-10:39:17/10:59:43-11:07:47

3

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 19-06620-VALLE

UNITED STATES OF AMERICA

v.

MUSTAPHA RAJI,

Defendant.

GOVERNMENT'S NOTICE OF PROFFER OF FACTS  
IN SUPPORT OF PRETRIAL DETENTION

The United States of America, by and through its undersigned Assistant United States Attorney, provides the following proffer of facts in support of its request for pretrial detention.

1. In July 2018, a Manhattan-based hedge fund was the victim of an email compromise, which led to a fraudulent \$1.7 million wire being sent to a Florida bank account in the name of "Unique Bamboo Investments," which was controlled by an individual named Nancy Martino-Jean, who has already been charged and convicted for her role in this scheme.

2. According to Florida public records, Nancy Martino-Jean is the President of Unique Bamboo Investments, and MUSTAPHA RAJI is the Vice-President.

3. Martino-Jean wired RAJI \$50,000 of the fraudulent funds directly.

4. Based on email search warrant returns, on July 29, 2018, an individual named Timothy Oyewole emailed his wire information to RAJI. On August 2, 2018, Martino-Jean wired \$25,000 to Oyewole. On August 3, 2018, Oyewole wired \$10,000 to Timmins Properties Limited, which according to Canadian public records, is a Canadian company controlled by MUSTAPHA RAJI's brother, Dauda Raji.

5. Based on a Google search history obtained via search warrant, on or about August 12, 2018, approximately two weeks after the fraudulent wire transfer was sent to her account from the victim company, Martino-Jean searched for “marble arch investments” (the name of the victim company). Based on the information provided by Google, this was the first and only search by Martino-Jean which contained the name of the victim company.

6. According to search warrant returns from Google, on August 13, 2018, Martino-Jean searched for, among other things, “how to remove everything from a computer.” In addition, on that same day, Martino-Jean visited a webpage entitled “How to erase my hard drive and start over,” which contained detailed instructions on how to erase all of the information on a hard drive.

7. Based on evidence from Martino-Jean’s email account as well as an email account belonging to MUSTAPHA RAJI, on or about August 15 and August 16, just days after Martino-Jean searched for “how to remove everything from a computer,” RAJI (along with another individual) forwarded Martino-Jean various scanned documents which purported to be a loan agreement between Unique Bamboo Investments and the victim hedge fund. However, the signature page bears a notarization, but no signatures, indicating that the document is fraudulent. This attempted cover-up in which RAJI participated is consistent with the false story Martino-Jean told the FBI during an interview after her arrest in September 2018. During that interview, she falsely told the FBI that the funds were a loan from the victim company to Unique Bamboo Investments.

8. Witness testimony would establish that MUSTAPHA RAJI was the person who provided the Unique Bamboo Investments bank account to co-conspirators so that the fraudulent funds could be deposited there.

9. The Government calculates the likely Sentencing Guidelines advisory imprisonment range as follows:

- a. Base offense level (USSG § 2B1.1(a)(1)): 7
- b. Loss amount of \$1.7 million (USSG 2B1.1(b)(1)(I)): +16
- c. Enhancement for sophisticated means (due to money movements and the use of numerous accounts to hide the stolen funds) (USSG 2B1.1(b)(10)): +2
- d. Enhancement for money laundering (USSG § 2S1.1(b)(2)(B)): +2
- e. Guidelines Range: 70-87 months in prison (after trial), 51-63 months in prison (after plea).

Respectfully Submitted,

ARIANA FAJARDO ORSHAN  
UNITED STATES ATTORNEY

By: s/William T. Shockley  
ASSISTANT UNITED STATES ATTORNEY  
500 East Broward Boulevard, Suite 700  
Fort Lauderdale, Florida 33394  
Court No. A5500088  
Telephone No. (954) 660-5787  
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E-Mail: William.T.Shockley@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2019, I electronically filed this document with the Clerk of the Court using CM/ECF.

s/William T. Shockley  
ASSISTANT UNITED STATES ATTORNEY



## COURT MINUTES

## United States Magistrate Judge Alicia O. Valle

Courtroom 110

Date: 12/20/2019 Time: 11:00 a.m.

Defendant: Mustapha Raji(J) J#: \_\_\_\_\_ Case #: 19-6220-AOVAUSA: Bill Shockley Attorney: Jan Smith, AFPOViolation: Conspiracy to Commit Wire FraudProceeding: Initial Appearance-Rule 40/5 Removal CJA Appt: \_\_\_\_\_Bond/PTD Held: ☐ Yes ☒ No Recommended Bond: Detention

Bond Set at: \_\_\_\_\_ Co-signed by: \_\_\_\_\_

☐ Surrender and/or do not obtain passports/travel docsLanguage: English☐ Report to PTS-as directed/or \_\_\_\_\_ x's a week/month by phone: \_\_\_\_\_ x's a week/month in person☐ Random urine testing by Pretrial Services \_\_\_\_\_ Treatment as deemed necessary☐ Refrain from excessive use of alcohol☐ Participate in mental health assessment & treatment☐ Maintain or seek full-time employment/education☐ No contact with victims/witnesses☐ No firearms☐ Not to encumber property☐ May not visit transportation establishments☐ Home Confinement/Electronic Monitoring and/or Curfew \_\_\_\_\_ pm to \_\_\_\_\_ am, paid by \_\_\_\_\_☐ Allowances: Medical needs, court appearances, attorney visits, religious, employment☐ Travel extended to: \_\_\_\_\_☐ Other: \_\_\_\_\_

Disposition:

Defendant present.  
 Advised of rights and charges.  
 AFPO appointed for purposes of this hearing.  
 FPD has conflict.  
 Deft request bond/Remand in this district.  
 Deft request time to retain private counsel.

NEXT COURT APPEARANCE Date: \_\_\_\_\_ Time: \_\_\_\_\_ Judge: \_\_\_\_\_ Place: \_\_\_\_\_

Report RE Counsel: 12-27-2019 @ 11am SeltzerPTD/Bond Hearing: 12-31-2019 @ 10amPrelim/Arraign or Removal: 12-31-2019 @ 10am

Status Conference RE: \_\_\_\_\_

D.A.R. 11:22:54 (rights); 11:53:56 Time in Court: 15 mins.

CHECK IF APPLICABLE: \_\_\_\_\_ For the reasons stated by counsel for the Defendant and finding that the ends of justice served by granting the ore tenus motion for continuance to hire counsel outweigh the best interests of the public & the Defendant in a Speedy Trial, the Court finds that the period of time from today, through and including \_\_\_\_\_, shall be deemed excludable in accordance with the provisions of the Speedy Trial Act, 18 USC 3161 et seq..



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

MUSTAPHA RAJI,

Defendant.

19mj6620-AOV  
STACED  
INDICTMENT

19 Cr. \_\_\_\_\_

19 CRIM 880

COUNT ONE  
(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

1. From at least in or about July 2018 up to and including at least in or about September 2018, in the Southern District of New York and elsewhere, MUSTAPHA RAJI, the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.
2. It was a part and an object of the conspiracy that MUSTAPHA RAJI, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television

**U.S. District Court  
Southern District of Florida (Ft Lauderdale)  
CRIMINAL DOCKET FOR CASE #: 0:19-mj-06620-AOV-1  
Internal Use Only**

Case title: USA v. Raji

Date Filed: 12/20/2019

Date Terminated: 01/07/2020

Assigned to: Magistrate Judge Alicia O.  
Valle

**Defendant (1)**

**Mustapha Raji**

26004-104

YOB 1970 English

TERMINATED: 01/07/2020

represented by **Joaquin Mendez , Jr.**

Joaquin Mendez P.A.

201 Alhambra Circle

Suite 1200

Coral Gables, FL 33134

305-375-0886

Fax: 305-375-0884

Email: [jm@jmendezlaw.com](mailto:jm@jmendezlaw.com)

**LEAD ATTORNEY**

**ATTORNEY TO BE NOTICED**

*Designation: CJA Appointment*

**Pending Counts**

None

**Disposition**

**Highest Offense Level (Opening)**

None

**Terminated Counts**

None

**Disposition**

**Highest Offense Level (Terminated)**

None

**Complaints**

**Disposition**

18:U.S.C. §1343 CONSPIRACY TO  
COMMIT WIRE FRAUD;

18:U.S.C. 1343 WIRE FRAUD;

18:U.S.C. 2315 RECEIPT OF STOLEN  
FUNDS; 18:U.S.C. 1956(a)(1)(B)(i)

MONEY LAUNDERING  
 CONSPIRACY

Plaintiff

USA

represented by **William T. Shockley**  
 United States Attorney's Office  
 500 East Broward Boulevard, Suite 700  
 Fort Lauderdale, FL 33394  
 954-356-7255, ext. 3587  
 Fax: 954-356-7230  
 Email: William.T.Shockley@usdoj.gov  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**  
 Designation: Retained

| Date Filed | #        | Docket Text   |
|------------|----------|---|
| 12/20/2019 | <u>1</u> | Magistrate Removal of Indictment from Southern District of New York Case number in the other District 19-CRIM-870 as to Mustapha Raji (1). (at) (Entered: 12/20/2019)   |
| 12/20/2019 |          | Arrest of Mustapha Raji (at) (Entered: 12/20/2019)  |
| 12/20/2019 |          | Set Hearings as to Mustapha Raji: Initial Appearance - Rule 5(c)(3)/40 set for 12/20/2019 AT 11:00 AM in Fort Lauderdale Division before FTL Duty Magistrate. (at) (Entered: 12/20/2019)  |
| 12/20/2019 | <u>2</u> | Minute Order for proceedings held before Magistrate Judge Alicia O. Valle: Initial Appearance in Rule 5(c)(3)/Rule 40 Proceedings as to Mustapha Raji held on 12/20/2019. Deft request bond/removal in this District. Deft request time to retain private counsel. Detention Hearing set for 12/31/2019 AT 10:00 AM in Fort Lauderdale Division before FTL Duty Magistrate. Removal Hearing set for 12/31/2019 AT 10:00 AM in Fort Lauderdale Division before FTL Duty Magistrate. Report Re: Counsel Hearing set for 12/27/2019 AT 11:00 AM in Fort Lauderdale Division before FTL Duty Magistrate. (Digital 11:22:54/11:53:56) (Signed by Magistrate Judge Alicia O. Valle on 12/20/2019). (at) (Entered: 12/20/2019) |
| 12/20/2019 | <u>3</u> | NOTICE of Proffer of Facts in Support of Pretrial Detention by USA as to Mustapha Raji (Shockley, William) (Entered: 12/20/2019)  |
| 12/27/2019 | <u>4</u> | Minute Order for proceedings held before Magistrate Judge Barry S. Seltzer: Report Re Counsel Hearing as to Mustapha Raji held on 12/27/2019. Defendant request more time, Granted, (Detention Hearing RESET for 1/7/2020 AT 11:00 AM in Fort Lauderdale Division before FTL Duty Magistrate., Report Re: Counsel Hearing RESET for 1/30/2019 AT 11:00 AM in Fort Lauderdale Division before FTL Duty Magistrate., Removal  |

|            |           |  |
|------------|-----------|--|
|            |           | Hearing RESET for 1/7/2020 AT 11:00 AM in Fort Lauderdale Division before FTL Duty Magistrate.). (Digital 10:33:22-10:39:17/RECALLED 10:59:43-11:07:47) (Signed by Magistrate Judge Barry S. Seltzer on 12/27/2019). (at) (Entered: 12/27/2019)  |
| 12/27/2019 |           | Reset Hearings as to Mustapha Raji: Report Re: Counsel Hearing RESET for 12/30/2019 AT 11:00 AM in Fort Lauderdale Division before FTL Duty Magistrate. <b>**CORRECTION WAS MADE **</b> (at) (Entered: 12/27/2019)   |
| 12/30/2019 | <u>5</u>  | Minute Order for proceedings held before Magistrate Judge Barry S. Seltzer: <b>Report Re Counsel</b> Hearing as to Mustapha Raji held on 12/30/2019. FPD has a conflict, RRC re-set. (Report Re: Counsel Hearing RESET for 1/3/2020 AT 01:00 PM in Fort Lauderdale Division before FTL Duty Magistrate.). (Digital 11:05:11-11:07:55) (Signed by Magistrate Judge Barry S. Seltzer on 12/30/2019). (at) (Entered: 12/30/2019)  |
| 01/03/2020 | <u>6</u>  | Minute Entry for proceedings held before Magistrate Judge Lurana S. Snow: <b>Attorney Appointment</b> Hearing as to Mustapha Raji held on 1/3/2020. Deft has not hire an attorney yet. He is interviewing attorneys. Now he wants to be sworn for counsel. Found indigent. Attorney added: Joaquin Mendez, Jr for Mustapha Raji for <b>REMOVAL/RULE 5 to another District CJA</b> representation. Date attorney was appointed CJA: 1/3/20. (Digital 13:12:00) (at) (Entered: 01/03/2020) |
| 01/07/2020 | <u>7</u>  | Minute Order for proceedings held before Magistrate Judge Lurana S. Snow: Detention Hearing as to Mustapha Raji held on 1/7/2020. Witness Agent John Migel Dugue testified. Court finds defendant to be a risk of flight and Orders defendant detained pending trial. Removal Hearing as to Mustapha Raji held on 1/7/2020. (Digital 11:02:52) Signed by Magistrate Judge Lurana S. Snow on 1/7/2020. (tpl) (Entered: 01/07/2020)  |
| 01/07/2020 | <u>8</u>  | First CERTIFICATE of Compliance Re Admitted Evidence for exhibit(s): 1, 2 and 3 as to Mustapha Raji by William T. Shockley (Attachments: # <u>1</u> Exhibit Gov. Ex. 1 - Indictment in SDNY, # <u>2</u> Exhibit Gov. Ex. 2 - Arrest Warrant in SDNY, # <u>3</u> Exhibit Gov. Ex. 3 - Photo of Defendant) (Shockley, William) (Entered: 01/07/2020)   |
| 01/07/2020 | <u>10</u> | COMMITMENT TO ANOTHER DISTRICT as to Mustapha Raji. Defendant committed to District of SD/NY.. Closing Case for Defendant. Signed by Magistrate Judge Lurana S. Snow on 1/7/2020. <i>See attached document for full details.</i> (dd) (Entered: 01/13/2020)  |
| 01/10/2020 | <u>9</u>  | ORDER OF DETENTION as to Mustapha Raji signed by Magistrate Judge Lurana S. Snow on 1/10/2020. (jz) (Entered: 01/12/2020)  |